



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
William A. Hinton State Laboratory Institute
305 South Street, Jamaica Plain, MA 02130

DEVAL L. PATRICK
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JUDYANN BIGBY, MD
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COMMISSIONER

Debra Payton, ADA

Norfolk County District Attorney's Office
By e-mail

March 14, 2011

Re: Comm. v. [REDACTED] State Lab no. [REDACTED]

ADA Payton,

Please find enclosed a discovery packet for the case noted above. The material is collated in the following manner:

- 1) the chemist's c.v.'s
- 2) the drug receipt to the Weymouth Police
- 3) inventory control card for the submission
- 4) the bench notes; the drug powder analysis form
- 5) the data from the Gas Chromatography/ Mass Spectrometry (GC/MS) run

I was the custodial chemist for the submission, performing the preliminary analysis. Annie Khan performed the confirmatory analysis by gas chromatography/mass spectrometry (gc/ms).

If you need further clarification of this material, please call me directly at (617) 983-6627.

Sincerely,

A handwritten signature in cursive script, reading "Michael Lawler".

Michael Lawler
Senior Chemist

Cc: Charles Salemi, Annie Khan

Curriculum Vitae

Michael Lawler

Education:

University of Virginia, Charlottesville, Va. Bachelor of Arts in English, 1975

Harvard University, Cambridge, Ma. Master of Arts in biology, 1995

Experience:

1990-present currently Chemist III, Mass. Dept. of Public Health, Drug Lab analyst determining the identity of unknown substances and providing expert testimony in the Courts. Conduct special testing for poisons within drug exhibits.

2005-present lecturer in chemistry, Curry College, Milton, Ma.

1988-1990 New England Newborn Screening (NENS) Biochemist conducting pilot studies and validation trials of new newborn screening tests. Investigator and co-author of papers noted below. Introduced screening test for Biotinidase Deficiency. Liaison with interstate collaborators in national studies.

1983-1988 Supervised NENS urine screening lab for metabolic disorders. Conducted research in collaboration with Children's Hospital (Boston) detecting neuroblastoma, a cancer of early childhood. Conducted reference testing for rare metabolic disorders for an international audience.

1982-1983 NENS hypothyroid assay technologist with Tuft's University

1979-1981 Mass. Bay Community College, staff technologist preparing materials for the laboratory technician program, which included reagents, apparatus and maintaining stock cultures of human pathogens.

Additional education and special training

Drug Analysis, completed six week training course by senior staff within the Department of Public Health Drug Analysis Laboratory

National Laboratory Network Training Program course as Expert Witness

Qualified as an expert witness in the Massachusetts Courts and the U.S. District Court

CDC course in cell culture

CDC course in antibiotic resistance

CDC course in public health response to bioterrorism

U.S. Army course in biologic warfare and terrorism

Journal Publications

Screening, 1992, 1:34-37; Lawler,M., Frederick,S., Rodriguez-Anza, S., Wolf,B., Levy,H., *Newborn Screening for Biotinidase Deficiency, Pilot Study and Follow-up of Identified Cases*

Genetic Screening, 1990, 11-18, Mitchell,M., Lawler,M., Walraven,C., Hermos,R., *To Screen or Not to Screen for Congenital Hyperplasia: Is that the Question?*

The Journal of Pediatrics, 116: 78-83, Secor-McVoy,J., Lawler,M., Schmidt, M., Ebers,D., Hart,P., Pettit,D., Blitzer,M., Wolf,B., *Partial Biotinidase Deficiency: Clinical and Biochemical Features*

Professional Affiliations

Northeastern Association of Forensic Scientists (NEAFS) since 2005

Awards

Theobald Smith Education Grant for graduate studies

Curriculum Vitae

Annie Khan (Dookhan)

Education:

University of Massachusetts, Boston, Ma., Master of Science in Chemistry, (present)

University of Massachusetts, Boston, Ma., Bachelor of Science in Biochemistry, 2001

Experience:

2003 – present

Chemist II, Massachusetts Department of Public Health, Drug Analysis Laboratory

- *Completed six-week training course conducted by senior staff within the Department of Public Health, Drug Analysis Laboratory.

- *Appointed Assistant Analyst by Assistant Commissioner of Public Health, January 2004.

- *Responsible for the identification of drugs to determine violations of harmful and narcotic drug laws.

- *Trained in the use of complex analytical instrumentation, microscopes and balances for the purpose of drug analysis.

- *Maintenance and repairs of analytical instruments.

- *Maintain the Quality Control of analytical instruments and controls/standards.

- * Maintain the Quality Control/Quality Assurance program for the drug lab.

- *Notary Public

2001 – 2003

QC Analyst II, UMMS-Massachusetts Biologic Laboratory, QC Material Control

- *Completed proficiency training conducted by a member of the staff within the Massachusetts Biologic Laboratory, Quality Control and Quality Assurance Department.

- *Routine QC testing of products for the FDA.

- *Trained in the use of complex analytical instrumentation, and balances for the purpose of QC analysis for product and validation projects.

- *Calibration, preventive maintenance, QC and QA of analytical instrumentation.

- *Writing, revising and reviewing Standard Operating Procedures (SOPs).

- *Complete testing of chemicals for Vendor Validation Project for the FDA.

- *Method Development for creating new techniques for the QC Department.

- *Compendial testing and interpretation of the USP, ACS, FCC, AOAC, Merck Index, PDR, etc.

Additional Training:

GLP/GMP course with Massachusetts Biologic Laboratory.

QC/QA training according to FDA Codes and Regulations.

GC course with Agilent Technologies and Restek.

HPLC course with Waters Cooperation.

FTIR course with Spectros.

TOC training with Massachusetts Biologic Laboratory and Sievers.

Association:

American Chemical Society (ACS)

PLEASE PRINT CLEARLY OR TYPE ALL INFORMATION

The Commonwealth of Massachusetts

Executive Office of Health and Human Services

Department of Public Health

State Laboratory Institute

Boston Drug Laboratory

Tel (617) 983-6622

Fax (617) 983-6625

Amherst Drug Laboratory

Tel (413) 545-2601

Fax (413) 545-2608

Boston Hours

8:00 – 11:00


2:00 – 4:00

Amherst Hours

9:00 – 12:00

1:00 – 3:00

DRUG RECEIPT

City or Department: Weymouth Police Reference No.: 

Name and Rank of Submitting Officer: DET Thomas Anderson

Defendant(s) Name (last, first, initial):



To be completed by Submitter

Description of Items Submitted

To be completed by Lab Personnel

Gross Weight

Lab Number

2) p/b w/ powder

5.28g

Received by: 

Date: 10.8.09

No. [REDACTED]

Date Analyzed: 03-14-10

City: Weymouth Police Dept.

Officer: Detective THOMAS ANDERSON

Def: [REDACTED]

Amount:

Subst: SUB

No. Cont: 2 Cont: pb

Date Rec'd: 10/08/2009

No. Analyzed: 1

Gross Wt.: 5.28 ✓

Net Weight: 0.16g

Tests: 5/11/10

Prelim:

Heroin

Findings:

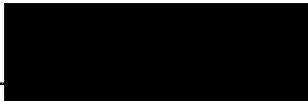
2930
Heroin

Gen B
D0513102

5-1470

DRUG POWDER ANALYSIS FORM

SAMPLE #



AGENCY

Weymouth

ANALYST

MM

No. of samples tested: 1

Turner & Giron

Evidence Wt.

5.28

PHYSICAL DESCRIPTION:

2 pb w/ substance

Gross Wt (): 0.6155

Gross Wt ():

Pkg. Wt:

Net Wt: 0.1677

OHAUS 2334 5-5-10

20g = 20.0001g

10g = 10.0001g

5g = 5.0001g

1g = 1.0000g

PRELIMINARY TESTS

Spot Tests

Cobalt Thiocyanate () +
Marquis +
Froehde's +
Mecke's +

Microcrystalline Tests

Gold Chloride _____
TLTA () _____

OTHER TESTS

PRELIMINARY TEST RESULTS

RESULTS _____

DATE _____

GC/MS CONFIRMATORY TEST

RESULTS Heroin

MS OPERATOR ADD

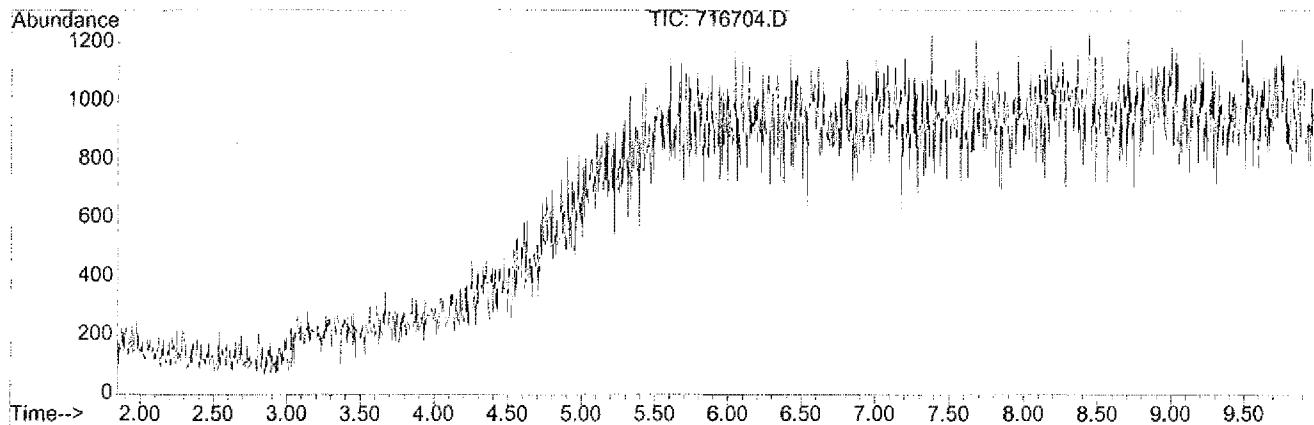
DATE 5-14-10

Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2010\SYSTEM4\05_13_10\716704.D
Operator : ASD
Date Acquired : 13 May 2010 7:42
Sample Name : BLANK
Submitted by :
Vial Number : 1
AcquisitionMeth: DRUGS
Integrator : RTE

✓ ASD
03-10-11



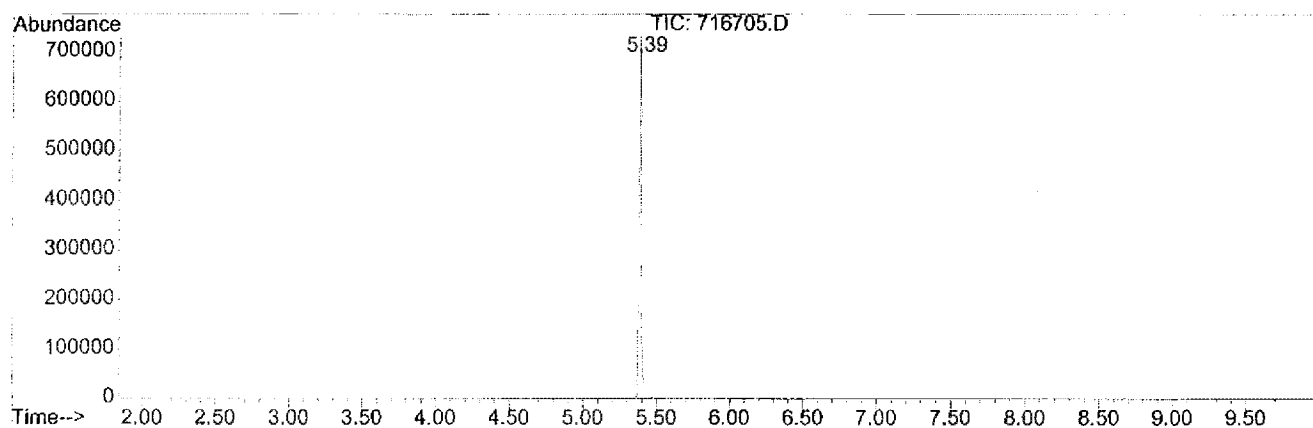
Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2010\SYSTEM4\05_13_10\716705.D
 Operator : ASD
 Date Acquired : 13 May 2010 7:55
 Sample Name : HEROIN STD
 Submitted by :
 Vial Number : 5
 AcquisitionMeth: DRUGS
 Integrator : RTE



Ret. Time	Area	Area %	Ratio %
5.386	844441	100.00	100.00

Area Percent / Library Search Report

Information from Data File:

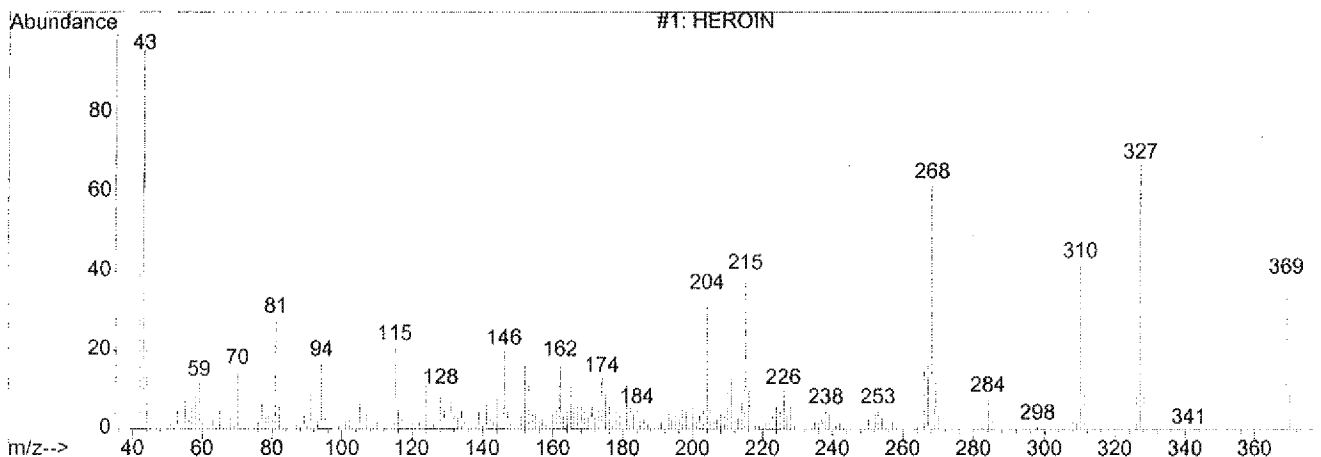
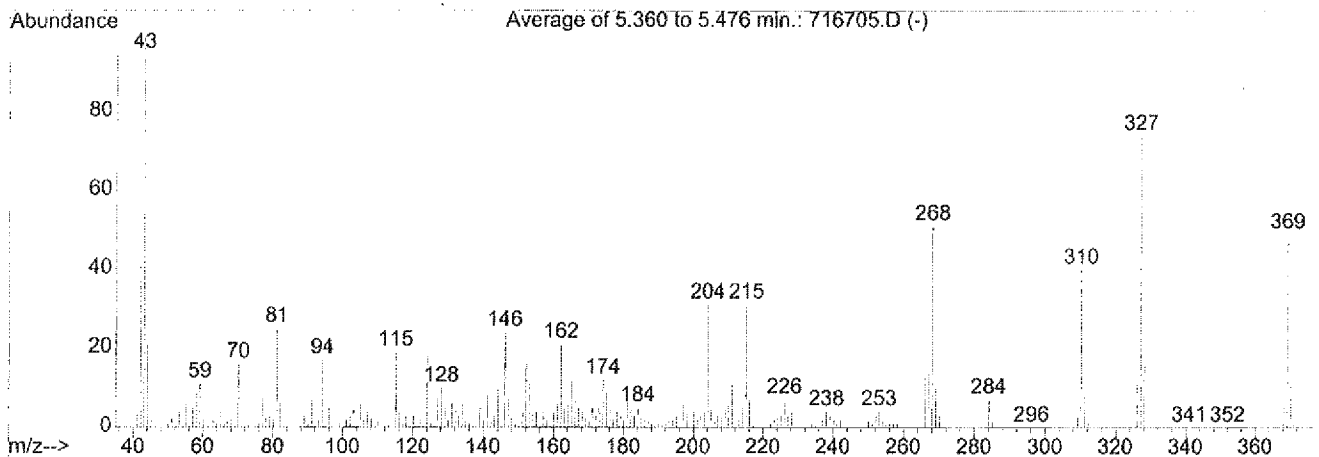
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File Name       : F:\Q2-2010\SYSTEM4\05_13_10\716705.D
Operator        : ASD
Date Acquired   : 13 May 2010   7:55
Sample Name     : HEROIN STD
Submitted by    :
Vial Number     : 5
AcquisitionMeth : DRUGS
Integrator      : RTE
  
```

```

Search Libraries: C:\DATABASE\SLI.L           Minimum Quality: 90
                  C:\DATABASE\PMW_TOX2.L      Minimum Quality: 90
                  C:\DATABASE\NIST98.L
  
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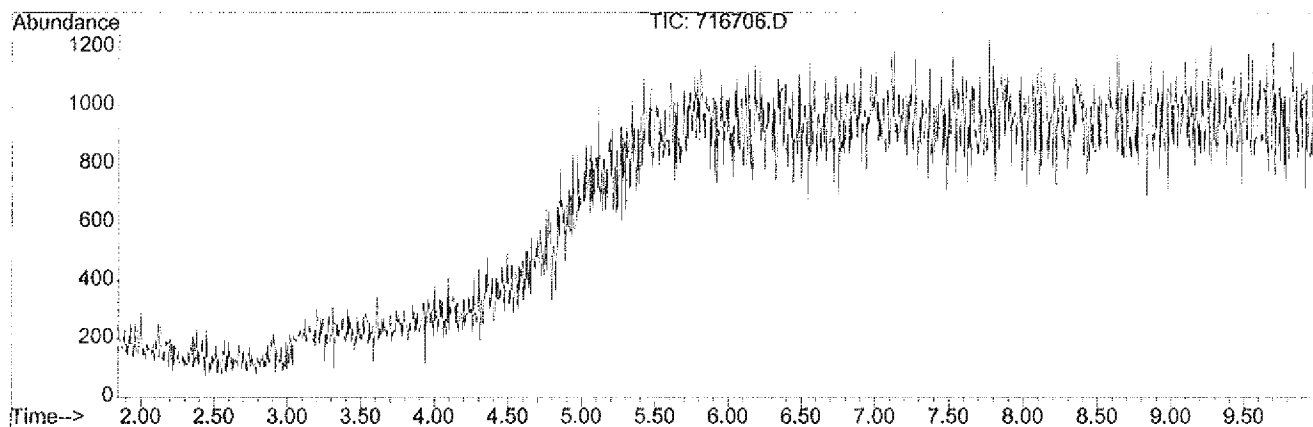
PK#	RT	Library/ID	CAS#	Qual
1	5.39	C:\DATABASE\SLI.L HEROIN	000561-27-3	99



Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2010\SYSTEM4\05_13_10\716706.D
Operator : ASD
Date Acquired : 13 May 2010 8:09
Sample Name : BLANK
Submitted by : DCS
Vial Number : 1
AcquisitionMeth: DRUGS
Integrator : RTE



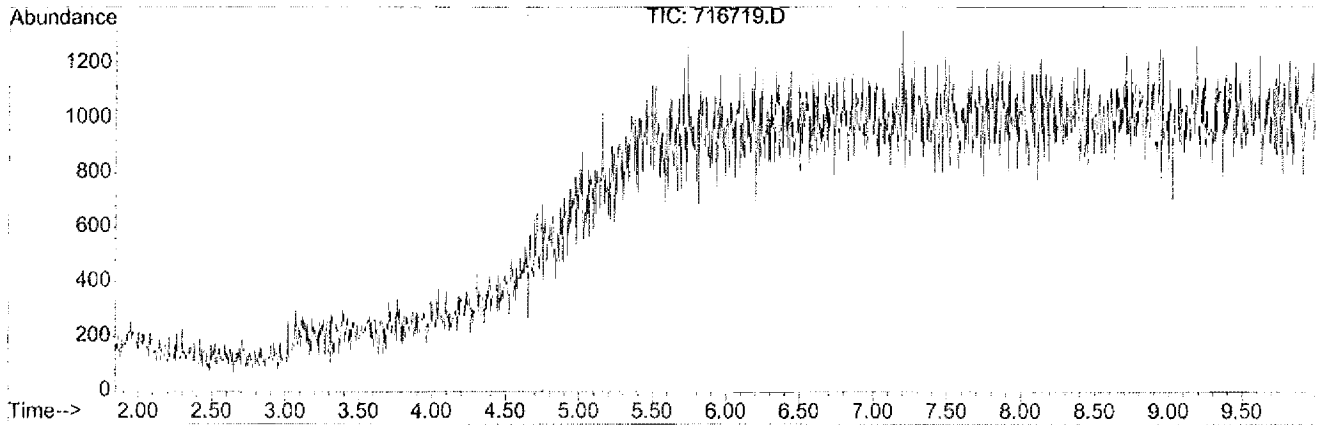
Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2010\SYSTEM4\05_13_10\716719.D
Operator : ASD
Date Acquired : 13 May 2010 11:07
Sample Name : BLANK
Submitted by : MGL
Vial Number : 1
AcquisitionMeth: DRUGS
Integrator : RTE



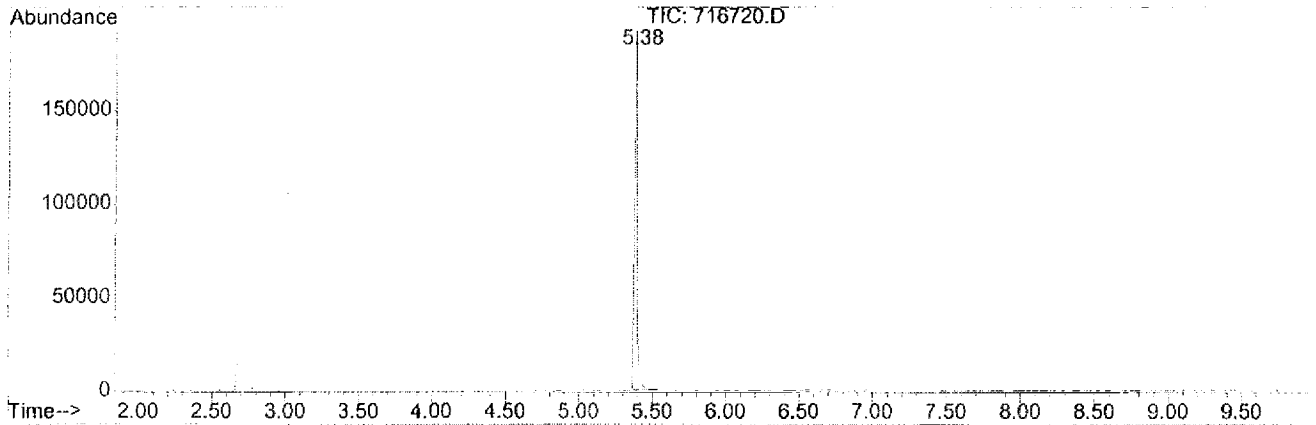
Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2010\SYSTEM4\05_13_10\716720.D
 Operator : ASD
 Date Acquired : 13 May 2010 11:20
 Sample Name : XXXXXXXXXX
 Submitted by : MGL
 Vial Number : 20
 AcquisitionMeth: DRUGS
 Integrator : RTE



Ret. Time	Area	Area %	Ratio %
5.381	239117	100.00	100.00

Area Percent / Library Search Report

Information from Data File:

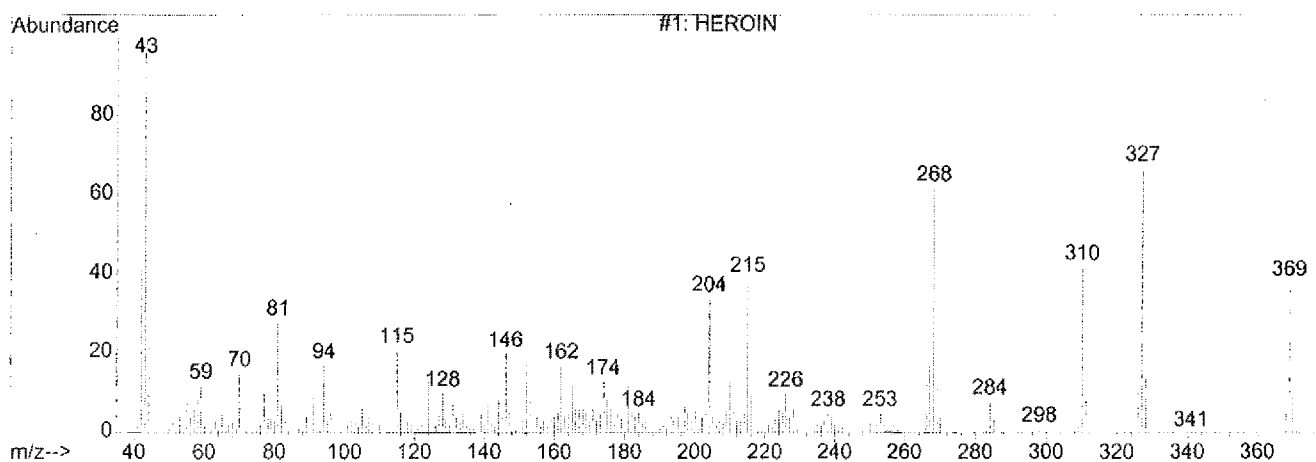
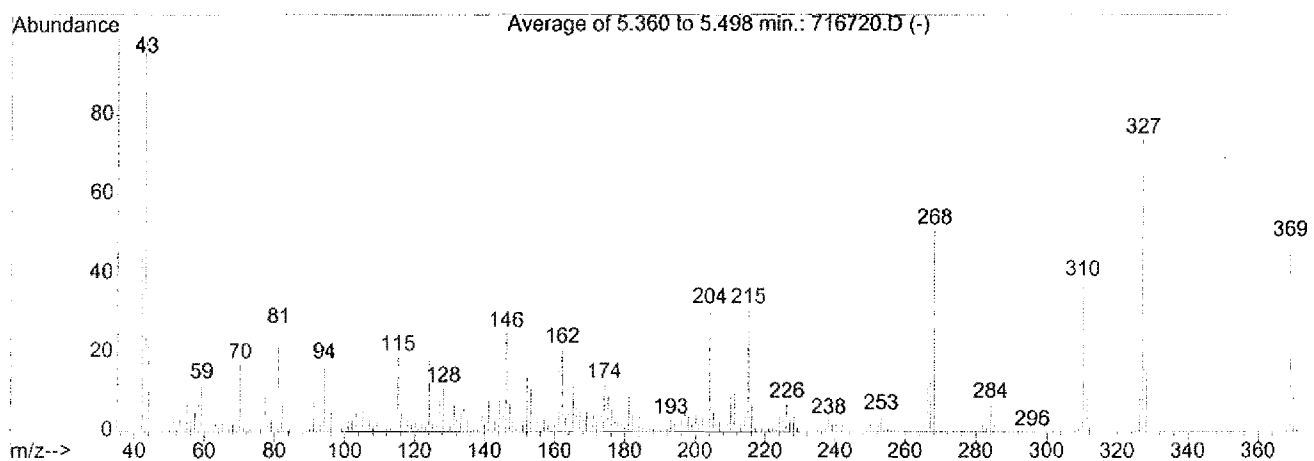
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Operator        : ASD
Date Acquired   : 13 May 2010  11:20
Sample Name     : ██████████
Submitted by    : MGL
Vial Number     : 20
AcquisitionMeth : DRUGS
Integrator      : RTE
  
```

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Search Libraries: C:\DATABASE\SLI.L           Minimum Quality: 90
                  C:\DATABASE\PMW_TOX2.L      Minimum Quality: 90
                  C:\DATABASE\NIST98.L
  
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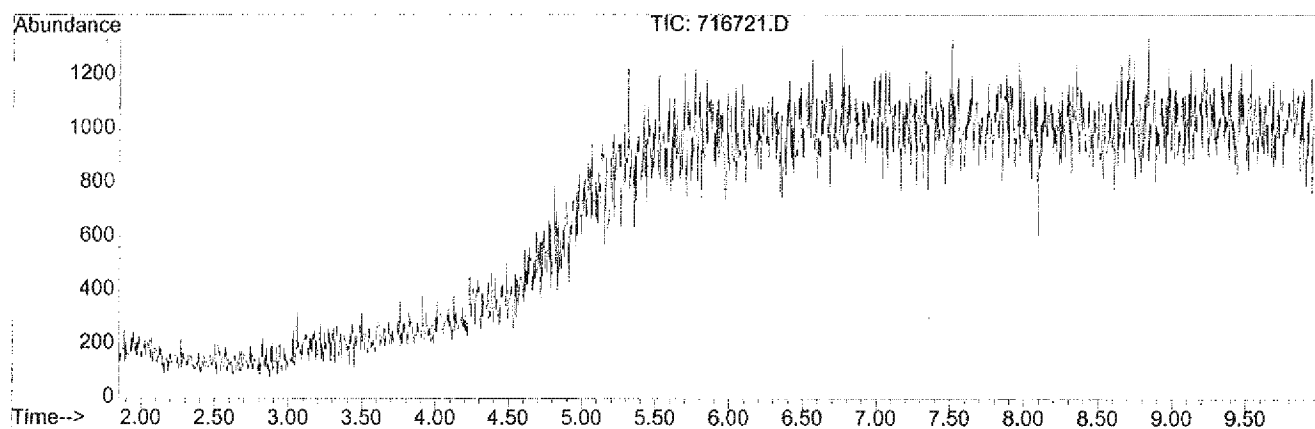
PK#	RT	Library/ID	CAS#	Qual
1	5.38	C:\DATABASE\SLI.L HEROIN	000561-27-3	99



Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2010\SYSTEM4\05_13_10\716721.D
Operator : ASD
Date Acquired : 13 May 2010 11:34
Sample Name : BLANK
Submitted by : MGL
Vial Number : 1
AcquisitionMeth: DRUGS
Integrator : RTE



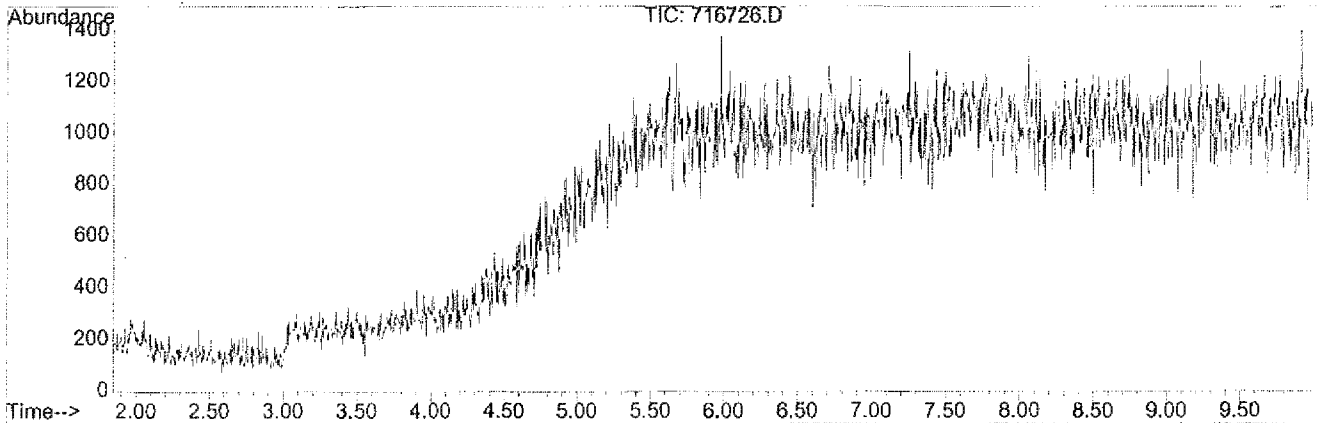
Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2010\SYSTEM4\05_13_10\716726.D
Operator : ASD
Date Acquired : 13 May 2010 12:42
Sample Name : BLANK
Submitted by :
Vial Number : 1
AcquisitionMeth: DRUGS
Integrator : RTE



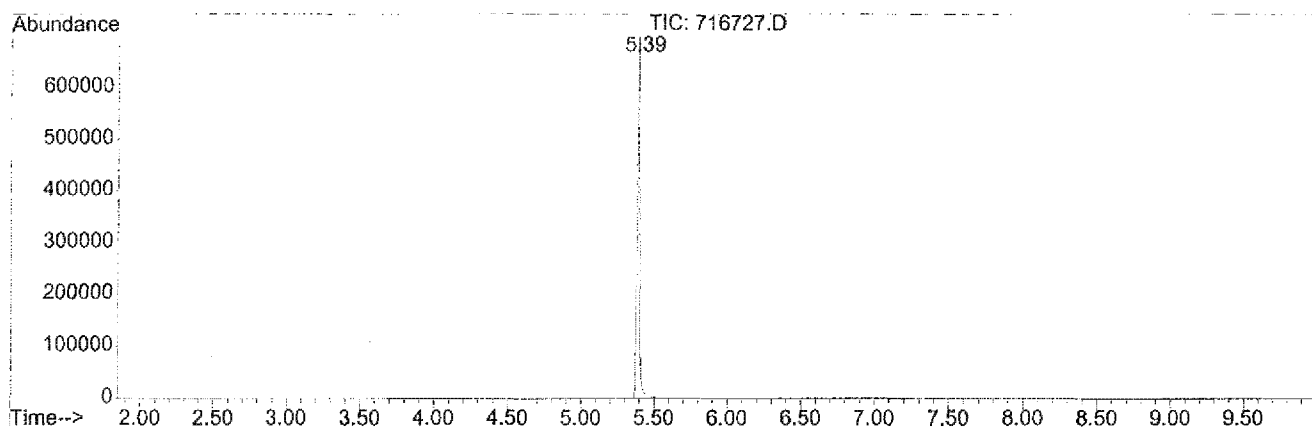
Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2010\SYSTEM4\05_13_10\716727.D
 Operator : ASD
 Date Acquired : 13 May 2010 12:55
 Sample Name : HEROIN STD
 Submitted by :
 Vial Number : 27
 AcquisitionMeth: DRUGS
 Integrator : RTE



Ret. Time	Area	Area %	Ratio %
5.390	816523	100.00	100.00

Area Percent / Library Search Report

Information from Data File:

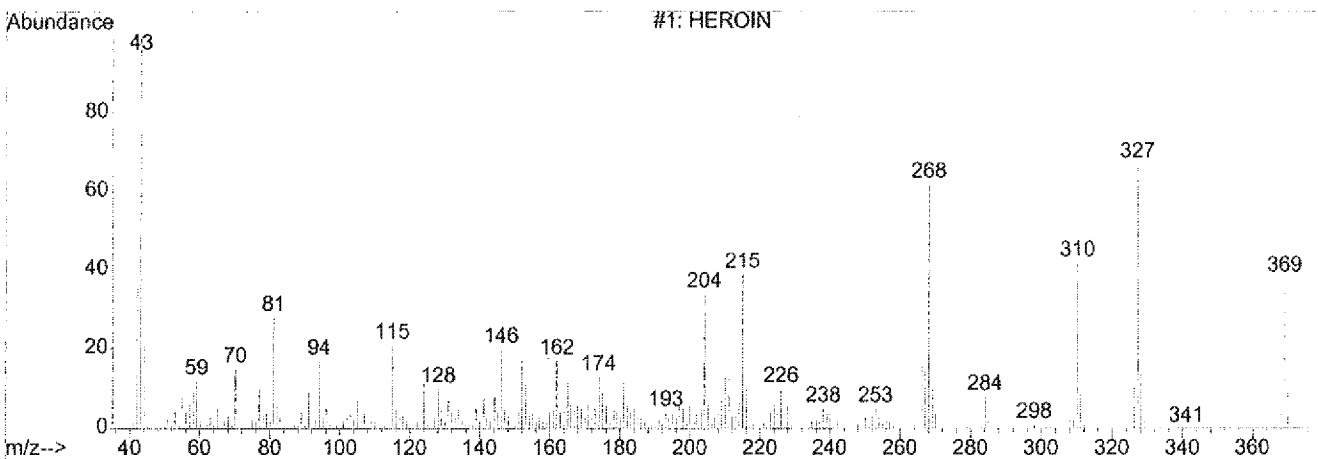
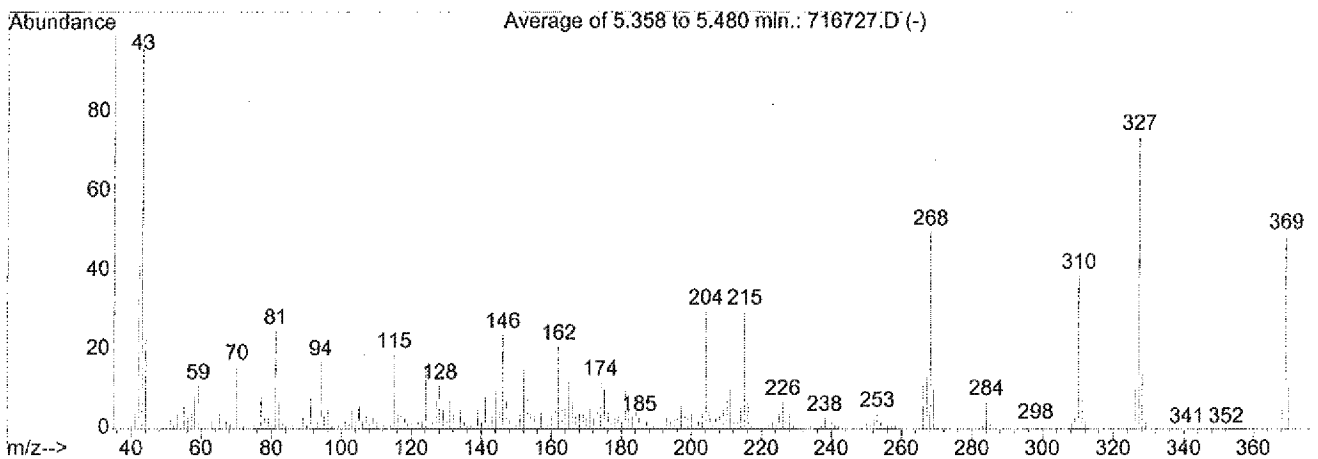
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Operator        : ASD
Date Acquired   : 13 May 2010  12:55
Sample Name     : HEROIN STD
Submitted by    :
Vial Number     : 27
AcquisitionMeth : DRUGS
Integrator      : RTE
  
```

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Search Libraries: C:\DATABASE\SLI.L           Minimum Quality: 90
                  C:\DATABASE\PMW_TOX2.L      Minimum Quality: 90
                  C:\DATABASE\NIST98.L
  
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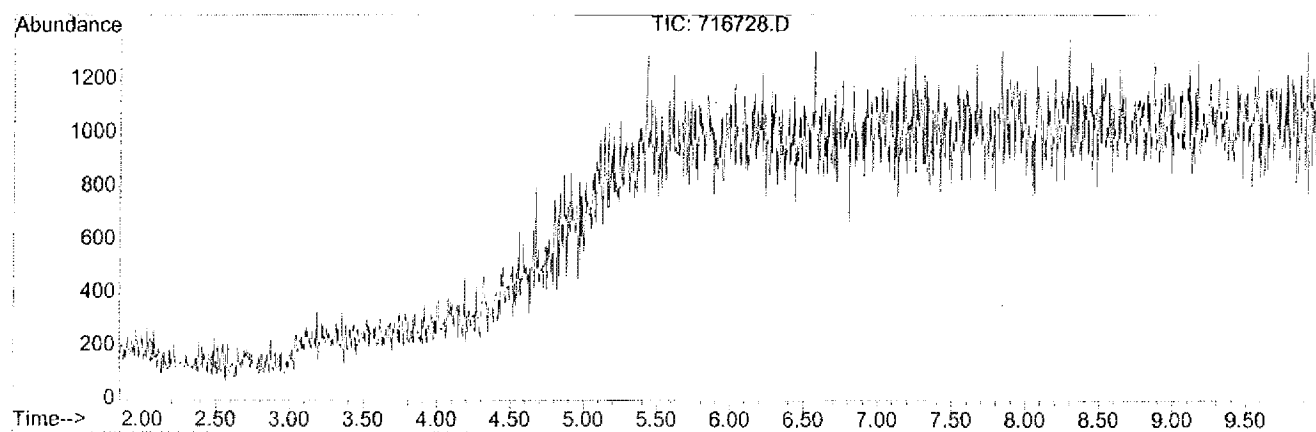
PK#	RT	Library/ID	CAS#	Qual
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Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2010\SYSTEM4\05_13_10\716728.D
Operator : ASD
Date Acquired : 13 May 2010 13:09
Sample Name : BLANK
Submitted by : MGL
Vial Number : 1
AcquisitionMeth: DRUGS
Integrator : RTE



Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Last page.....no further data